

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TIMOTHY ASPAN, JR., individually and on)	
behalf of the class defined herein,)	
)	
Plaintiff,)	
)	Case No.: 08 CV 2826
v.)	
)	Judge Hart
HUDSON & KEYSE, LLC,)	
)	
Defendant.)	

AGREED MOTION FOR AN ENLARGEMENT OF TIME

Defendant, Hudson & Keyse, LLC ("Hudson") by and through its attorneys, David M. Schultz and Corinne C. Heggie pursuant to Rule 6 and for its Agreed Motion for an Enlargement of Time to file its responsive pleading to plaintiff's Complaint, states as follows:

1. On or about May 15, 2008, plaintiff filed a class action Complaint against defendant alleging that defendant violated the Fair Debt Collection Practices Act ("FDCPA").

2. Defendant has moved for three enlargements previously. Defendant's responsive pleading is due August 6, 2008.

3. Defendant requests an additional 21 days to file its responsive pleading.

4. The parties are in ongoing settlement discussions. Defendant served a class offer on plaintiff July 23, 2008. Plaintiff responded on July 29, 2008. Defense counsel anticipates that a response to plaintiff's counter demand will be made. Counsel conferred with their client about the demand late last week. Given the nature of the class definition in the Complaint and the elements of plaintiff's counter demand for settlement, defendant is working to analyze the terms of the counter demand in order to make a response.

5. Defendant is seeking additional time to permit the parties to exhaust class settlement discussions which are on going.

6. On August 4, 2008, defense counsel discussed the additional time with counsel for the plaintiff. Counsel for the plaintiff has no objection to the relief sought herein.

7. This time is not meant for the purpose of unnecessary delay and will not prejudice any party to the litigation.

WHEREFORE, Defendant, Hudson & Keyse, LLC, respectfully, requests that this Court grant it an additional 21 days, up to and including August 27, 2008, to file its responsive pleading to plaintiff's Complaint.

Respectfully Submitted,

s/ Corinne C. Heggie
One of the attorneys for Defendant,
Hudson & Keyse, LLC

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